

Via ecfhelp@njd.uscourts.gov of US District Court of New Jersey's Clerk

The Honorable Jose R. Almonte

US District Court of New Jersey

50 Walnut Street

Newark, NJ 07102

(973) 645-3730

Re: Williams v. Stack, et al. Case No.: 2:22-cv-02439-(JXN)(JRA) Request written permission to file a Motion to hold Attorneys and Defendants in contempt of Court and expedite the Jury Trial.

Dear Judge Almonte:

As you are aware on May 1, 2022, Plaintiff, Williams, filed a verified Complaint with comprehensive exhibits' evidentiary support documents, settled laws of the US and NJ Supreme Courts and the US Constitution in the US District Court of New Jersey seeking compensatory damages and punitive damages as a result of the loss of rental income, and consequential damages that the plaintiff has endured for more than the past 7 years now from August 1, 2015, to the present as of Sept 5, 2022, and ongoing due to the Takings by the City of Union City and its officials and agents of Williams' private property for public use Without Just Compensation in violations of the Fifth Amendment of the US Constitution as incorporated into the Fourteenth Amendment to the Individual States.

Throughout that period of more than 7 years, the lead defendant, Mr. Brian P. Stack, City of Union City's Mayor, and his minions established Williams in servitude and seek to maintain him in servitude to the present at every turn through deprivations of his US Constitutional rights, intimidations, harassments with frivolous Complaints in Municipal and State of New Jersey Courts, and threats of criminal charges for simply exercising his US Constitutional rights.

After the defendants submitted their Answers through Motions on July 1, 2022, and your review of the case's verified complaint and answers then on July 8, 2022, you issued a Letter Order for early disclosures as stated “ **Counsel are advised that the early**

disclosure requirements of Fed. R. Civ. P. 26 will be enforced. Therefore, counsel shall immediately exchange the information set forth in Rule 26 without a formal discovery request.”

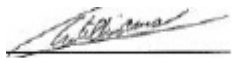
Sanctions in contempt of Court as stated “ **Failure to comply with the terms of this Order may result in imposition of sanctions.”**

Attorneys and Defendants are refusing early disclosures in contempt of Court and in open defiance of your Order of early disclosures and they plan to drag this case to another 3 to 4 years in the US District Court of New Jersey because they are interested in a pretrial conference to take place in January 2024 and most likely with a hidden plan in between for further delayed tactics besides already kept Williams’ property hostage for public use without just compensation and terrorized Williams for more than 7 years and ongoing.

Williams is seeking to obtain from you written permission to file a Motion to hold Attorneys and Defendants in contempt of Court and expedite the Jury Trial, as required per your letter “**No motions are to be filed without written permission from the Court, ...**”

Without imposed sanctions to hold the Attorneys and Defendants in contempt of Court and expedite the Jury Trial would simply embolden them to further defy Court Orders and extend their delayed tactics by adding more severe financial hardship and irreparable harms against the Plaintiff, Williams.

Respectfully,



Christopher Williams
Plaintiff, Pro Se / Owner-Occupied
906 New York Ave # 2A
Union City, NJ 07087
(908) 679-9154
Christophswilliams@gmail.com

Dated: September 5, 2022

From: Christopher Williams <christophswilliams@gmail.com>

Sent: Thursday, August 25, 2022 2:30 PM

To: Joseph M. Franck <jfranck@iwwt.law>

Cc: Nicholas A. Grieco <ngrieco@iwwt.law>; jvenuti@swartzcampbell.com

Subject: Re: Follow-up # 3 on Early Disclosure, Revised Table Settlement Offer by Plaintiff as of August 1, 2022, and Proposed Joint Discovery of Williams v. Stack, et al. Case No.: 2:22-cv-02439-(EP)(JRA) pursuant to Fed. R. Civ. P. 26 per Letter Order by US M...

Messrs. Grieco, Franck, and Venuti, Jr.:

Williams has not heard from you since Monday, August 22, 2022, on how would you, and your clients like to proceed to be in compliance with the Letter Order by US Magistrate Judge Jose R. Almonte on July 8, 2022, stated that Early Disclosure and Joint Discovery Plan would be enforced.

Please kindly advise because time is of the essence per Letter Order by US Magistrate Judge Jose R. Almonte on July 8, 2022, and your clients have taken Plaintiff's private property for public use, and without just compensation from August 1, 2015, to the present as of August 25, 2022. Now, going at a loss/compensatory damages of Monthly rental income of \$ 2,350.00 in violation of his Fifth Amendment of the US Constitution as incorporated into the Fourteenth Amendment to individual States.

Respectfully,

Christopher Williams
Plaintiff, Pro Se / Owner-Occupied
906 New York Ave # 2A
Union City, NJ 07087
(908) 679-9154
Christophswilliams@gmail.com

From: Joseph M. Franck
Sent: Thursday, August 25, 2022 3:43 PM
To: Christopher Williams <christophswilliams@gmail.com>
Cc: Nicholas A. Grieco <ngrieco@iwwt.law>; jvenuti@swartzcampbell.com
Subject: RE: Follow-up # 3 on Early Disclosure, Revised Table Settlement Offer by Plaintiff as of August 1, 2022, and Proposed Joint Discovery of Williams v. Stack, et al. Case No.: 2:22-cv-02439-(EP)(JRA) pursuant to Fed. R. Civ. P. 26 per Letter Order by US M...

Mr. Williams, it is our position that discovery and disclosures be stayed pending resolution on the motions to dismiss. Please advise if you consent to same.

Best,

Joseph M. Franck



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Christopher Williams <christophswilliams@gmail.com>

Re: Williams v. Stack, et al. Case No.: 2:22-cv-02439-(EP)(JRA) Plaintiff's follow-up # 4 is vehemently opposing Defendants' delayed tactics to early disclosures ordered by US Magistrate Judge Jose R. Almonte on July 8, 2022.

Christopher Williams <christophswilliams@gmail.com>

Wed, Aug 31, 2022 at 4:03 PM

To: "Joseph M. Franck" <jfranck@iwwt.law>

Cc: "Nicholas A. Grieco" <ngrieco@iwwt.law>, "jvenuti@swartzcampbell.com" <jvenuti@swartzcampbell.com>

Mr. Franck:

Of course, Plaintiff is vehemently opposing your clients' delayed tactics to early disclosures ordered by US Magistrate Judge Jose R. Almonte on July 8, 2022. Your clients actions are simply prolonging a never ending Takings of Williams' private property for public use without just compensation since August 1, 2015 to the present as of August 31, 2022, that's more than 7 years ago in violations of his Constitutional rights and now, ongoing at a monthly rent rate of \$ 2,350.00 compensation. As of tomorrow, September 1, 2022, another month's rent of **\$ 2,350** would be added until the 1st-floor Tenants are removed making Williams' loss and seeking compensation from Aust 1, 2022, **\$ 401,268.52 + \$ 2,350.00 = \$ 403,618.52.**

After reviewing Plaintiff Verified Complaint filed on May 1, 2022, and your Motion to Dismiss with Prejudice filed on July 1, 2022, US Magistrate has not found grounds that Plaintiff's verified complaint was barred as a matter of law or has no defect of any kind and your Motion could not present any grounds as a matter of law to the contrary then on July 8, 2022, US Magistrate Judge Jose R. Almonte issued a Letter Order requiring early disclosures.

We would see what the US Magistrate Almonte or US Judge Padin decided about your clients' delayed tactics to early disclosures ordered by Letter Order of US Magistrate Judge Jose R. Almonte on July 8, 2022.

Please kindly keep in mind more delayed tactics, reprisal, harassment, or intimidations made by your clients. So, that's more evidence for the Plaintiff to convince a Jury of your clients actual malice, actual fraud, and willful prosecutorial misconduct justifying the need to deter your clients from repeating their misdeeds to others.

Please kindly advise.

Respectfully,

Christopher Williams

Plaintiff, Pro Se / Owner-Occupied

906 New York Ave # 2A

Union City, NJ 07087

(908) 679-9154

Christophswilliams@gmail.com